

EXCERPTS OF  
JOHN BRADY BARRINEAU  
DEPOSITION

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

JOHN BRADLY BARRINEAU,	)	CIVIL ACTION NO. CV05-0028
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
PROMARINE TECHNOLOGY and	)	
CABRAS MARINE CORPORATION,	)	
	)	
Defendants.	)	

DEPOSITION TRANSCRIPT

OF

**JOHN BARRINEAU**

February 20, 2007

**COPY**

PREPARED BY:

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CARLSMITH BALL

DATE: 03.27.07 TIME: 10:54am *JB*

1 A If there are two umbilicals, one is in  
2 the water, one is on the deck of a fairly small  
3 dive vessel, before any valves are shut-off,  
4 any valves that especially that might not be  
5 marked, follow the umbilicals on the deck first  
6 from the valve. And, the one that goes from  
7 the valve inside the water will probably have  
8 the diver on the other end of it. The one  
9 that's on the deck of the boat with the hat is  
10 probably the one that there's no diver, so.

11 Q Okay. Well, then, I just learned  
12 something that I didn't learn from reading what  
13 I read. I mistakenly thought that the second  
14 diver, which I'll just call the standby diver -  
15 -

16 A No.

17 MR. BERLINE: Well, let Dave finish.

18 BY MR. LEDGER:

19 Q The second hat, which colored mask did  
20 you have on? I'll just go out that way. do  
21 you remember?

22 A I do not remember.

23 Q Okay. And your answer to my previous  
24 question when you said, all one would have to  
25 do is follow the umbilical that goes to the man

1 in the water, and follow the one that goes to  
2 the dive suit or equipment that's on the deck,  
3 then one would know not to shut-off the valve  
4 that controls the hose going into the water.

5 A Correct.

6 Q Okay. From your answer, what I gather  
7 is that, the second hose was not leading to a  
8 diver in the water, but rather it terminated on  
9 the deck of the boat. Is that what you mean by  
10 your explanation?

11 A Correct.

12 Q Okay. Are you assuming that that  
13 second diver never went in the water or do you  
14 know that based on some information that you've  
15 come across in one way or another?

16 MR. BERLINE: Objection, vague.  
17 David, do we need a time frame? Is that before  
18 or after -- does it matter? I'm just saying --

19 MR. LEDGER: Sure, that's fair.

20 BY MR. LEDGER:

21 Q Let me be a little bit more specific.  
22 It's that, when this operation commenced, when  
23 you went into the water and your intention was  
24 to go and scrub the bottom of the Military  
25 Sealift Command Ship, the Hauge (phonetic),

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